

**A**

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BRENHAM NATIONAL BANK,

*Plaintiff*

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§

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V.

§

Case Number: 4:24-cv-0391

CITIBANK, N.A. and CIBANCO S.A.,

*Defendants*

§

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§

**AFFIDAVIT**

STATE OF TEXAS

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§

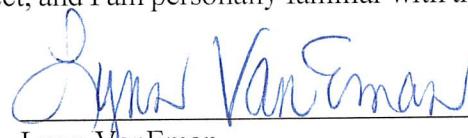
COUNTY OF WASHINGTON

§

BEFORE ME, the undersigned authority, on this day personally appeared Lynn VanEman, personally known by me to be the person whose name is subscribed below, and who, after being by me first duly sworn, stated the following:

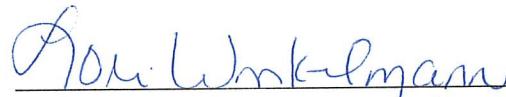
1. My name is Lynn VanEman. I am over twenty-one (21) years of age and am fully competent in all respects to make this Affidavit. I am the Senior Vice President, Chief Operating Officer of Brenham National Bank Texas (“BNB”), and I am fully authorized to make and sign this Affidavit on behalf of BNB. Based on my personal involvement in this matter and my employment with BNB, I have personal knowledge of the facts stated in this Affidavit, and they are true and correct.
2. BNB has an agreement with its customer, Powerfam Washes, LLC, for the sending of wire transfers. This security procedure is performed via a checklist titled “Outgoing Wire Checklist,” and its purposes include verifying that the customer is the one requesting the wire transfer and detecting any potential errors in the payment order. The Outgoing Wire Checklist was completed in this case, and it is attached hereto as Tab 1. The Outgoing Wire Checklist was completed upon receipt of the Wire Transfer Request, attached hereto as Tab 2. The Wire Transfer Request coincided with Powerfam Washes LLC’s draw on its line of credit from BNB in the same amount. A copy of that draw request is attached as Tab 3.
3. I am also a custodian of records for BNB. Attached to this Affidavit as Tabs 1-3 are true and correct copies of business records kept by BNB. These records contain conditions, events, and/or opinions that were made at or near the time, from information transmitted by persons with knowledge of same; the records are kept in the course of a regularly conducted business activity,

and it was the regular practice of that business activity to make these records.  
The records are true and correct, and I am personally familiar with the records.



Lynn VanEman

SWORN TO AND SUBSCRIBED before me by Lynn VanEman on May 23, 2025.



NOTARY PUBLIC IN AND FOR THE STATE OF TEXAS

